



Ms Samantha Parsons
Committee Clerk
Standing Committee on Uniform Legislation and Statutes Review
Legislative Council - Parliament House
PERTH WA 6000

Email: unileg@parliament.wa.gov.au

Re: Gene Technology (Western Australia) Bill 2014

Dear Ms Parson,

Bayer CropScience is a significant technology provider to Australia's agricultural industries. We are providers of both agricultural chemical and biotechnology (plant science) products to farmers in Australia.

18 December 2014

Bayer CropScience Pty Ltd
ABN 87 000 226 022

Given the relatively small size of the Australian agricultural sector (representing only 3 per cent of the global market), it is vital that agricultural regulations are harmonised nationally to minimise regulatory burden and ensure Australian farmers do not miss out on access to vital agricultural tools. Bayer CropScience strongly supports a nationally harmonised approach to regulating gene technology in Australia.

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Bayer CropScience commends the current Western Australian Government for its support of Western Australian agriculture through granting Ministerial exemptions for federally approved GM crops from moratorium Orders made under the *GM Crops Free Areas Act (WA) 2003*. The moratorium legislation presents an additional level of regulatory red tape, at odds with a nationally harmonised approach, that puts a brake on innovations in the plant science industry from reaching Western Australian farmers. The commercial production of GM canola in Western Australia has resulted in a direct on-farm benefit of over \$12 million to Western Australian growers this season alone.

Bayer CropScience supports the finding of the 2011 review of the Commonwealth *Gene Technology Act* that improved harmonisation of Australia's arrangements to regulate gene technology would lead to economic benefits and improved efficiency and effectiveness. Bayer CropScience supports Recommendation 3 of the Commonwealth review proposing that jurisdictions follow the examples of New South Wales, the Northern Territory and Tasmania, automatically adopting changed gene technology regulation by reference to the Commonwealth legislation in order to achieve further administrative and efficiency gains. Bayer CropScience strongly supports the *Gene Technology (Western Australia) Bill 2014* as it will enable Western Australia to become in 'lock-step' with Commonwealth gene technology legislation. This will avoid periods of inconsistency between state and federal regulation during which there is confusion and uncertainty that could lead to non-compliance. The *Gene Technology (Western Australia) Bill 2014* will significantly reduce the 'red tape' currently involved in administration of the *Gene Technology Act 2006 (WA)*.

Please do not hesitate to contact Bayer CropScience's Regulatory Affairs Manager – Seeds and Traits, Dr. Judy Pattermann (03) 9248 6619; judy.pattermann@bayer.com) should you require any clarification in respect to any aspect of these comments.

Yours sincerely,
Bayer CropScience

Mr Rob Hall
General Manager - Seeds